

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

MARY LOU PETT, individually and on behalf  
of all others similarly situated,

Plaintiff,

v.

PUBLISHERS CLEARING HOUSE, INC.,

Defendant.

Civil Action No. 2:22-CV-11389-DPH-EAS

**STIPULATION FOR EXTENSION OF  
TIME TO ANSWER OR OTHERWISE  
RESPOND TO PLAINTIFF’S CLASS  
ACTION COMPLAINT**

Complaint Filed: June 22, 2022

Complaint Served: June 30, 2022

Plaintiff Mary Lou Pett (“Plaintiff”) and Defendant Publishers Clearing House, Inc. (“PCH” and, together with Plaintiff, the “Parties”) hereby file this stipulation seeking an order from the Court extending PCH’s deadline to respond to Plaintiff’s Class Action Complaint by 31 days to Monday, September 19, 2022 (“Stipulation”). Good cause exists to grant this Stipulation based on the following facts:

1. On June 22, 2022, Plaintiff filed in the United States District Court for the Eastern District of Michigan a class action complaint against PCH (“Complaint”), alleging that PCH violated Michigan’s Preservation of Personal Privacy Act (“PPPA”). [Dkt. No. 1.]

2. Following Plaintiff’s filing of her Complaint, PCH investigated and is continuing to investigate Plaintiff’s cause of action and her allegations in support of same. The Parties have been meeting and conferring on the results of that investigation.

3. In light of that meet-and-confer process, the Parties filed on July 21, 2022 a stipulation to continue PCH’s responsive pleading deadline by 29 days. [Dkt. No. 8.] The Court granted the stipulation on July 25, 2022, making PCH’s current responsive pleading deadline August 19, 2022. [Dkt. No. 13.]

4. Since then, Plaintiff has identified an additional seven individuals who Plaintiff thinks may have a claim against PCH under the PPPA. PCH is investigating those individuals claims and, once complete, will meet and confer with Plaintiff on the results of the investigation.

5. Given the above and in light of the Parties' continuing meet-and-confer efforts, the Parties believe that the additional time requested herein will further allow the Parties to explore Plaintiff's and the other individuals' claims without engaging in costly and, potentially, unnecessary motions practice.

6. Therefore, the Parties respectfully request that the Court grant this Stipulation and continue PCH's responsive pleading deadline by 31 days to Monday, September 19, 2022.

**IT IS SO STIPULATED.**

Dated: August 18, 2022

Respectfully submitted,

By: s/ Frank S. Hedin

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*Counsel for Plaintiff and the Putative Class*

DATED: August 18, 2022

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Attorneys for Defendant

PUBLISHERS CLEARING HOUSE, INC.

**CERTIFICATE OF SERVICE**

I hereby certify that on August 18, 2022, I electronically filed the foregoing  
**STIPULATION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE  
RESPOND TO PLAINTIFF'S CLASS ACTION COMPLAINT** using the CM/ECF system,  
which will send notification of such filing to all counsel of record.

/s/ Matthew D. Pearson